

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

NASTARAN SIROUSIAN,	)	
	)	Case No. 2:19-cv-00072-TSZ
Plaintiff,	)	
	)	<b>JOINT STIPULATION TO</b>
v.	)	<b>REMAND REMOVED ACTION;</b>
	)	<b>ORDER</b>
KINDER CARE LEARNING CENTERS	)	
LLC, a Delaware corporation,	)	
	)	
Defendant.	)	

Plaintiff Nastaran Sirousian (“Plaintiff”) and Defendant KinderCare Learning Centers LLC (“Defendant”) stipulate as follows:

1. Plaintiff commenced this action on or around October 30, 2018, by filing, along with three other named plaintiffs who are no longer parties, a Class Action Complaint in King County Superior Court, captioned *Sirousian v. KinderCare Learning Centers, LLC*, Case No. 18-2-27341-2 SEA (“State Court Action”). Plaintiff’s Class Action Complaint was served on Defendant on or around October 31, 2018.
2. On November 20, 2018, Plaintiff filed an Amended Complaint in the State Court Action, on behalf of herself only. Plaintiff’s Amended Complaint was served on Defendant on or around November 26, 2018.
3. On January 15, 2018, Defendant filed a Notice of Removal of the State Court Action to this Court pursuant to 28 U.S.C. §§ 1332, 1441 and 1446 (Dkt. 1), based on diversity jurisdiction, attaching Plaintiff’s Amended Complaint in the State Court Action.

4. In its Minute Order of February 14, 2019 (Dkt. 12), this Court instructed Defendant to submit an amended corporate disclosure statement pursuant to Local Civil Rule 7.1, identifying each of the members or owners of each of the five foreign partnerships and two Delaware partnerships (“Seven Members”) that are members of Defendant’s parent LLC (KC Parent, LLC); and identify the citizenship of each member or owner of the Seven Members.

5. In light of the fact that some members or owners of the Seven Members are *themselves* partnerships or LLCs, identifying the citizenship of these members or owners would necessitate additional, expanding layers of disclosure, extending to entities and persons with no connection to this litigation. As a result, Defendant has been unable to determine with certainty the citizenship of all members or owners of each of the Seven Members of its parent LLC.

6. The Parties have thus agreed and stipulate that this case should be remanded to King County Superior Court.

DATED: March 8, 2019

LANE POWELL PC

By s/ John S. Devlin

John S. Devlin III, WSBA No. 23988  
Taylor Washburn, WSBA No. 51524

1420 Fifth Avenue, Suite 4200  
P.O. Box 91302  
Seattle, WA 98111-9402  
Telephone: 206.223.7000  
Facsimile: 206.223.7107  
devlinj@lanepowell.com  
washburnt@lanepowell.com

*Attorneys for Defendant KinderCare  
Learning Centers LLC*

JOINT STIPULATION TO REMAND;  
ORDER - 2  
CASE NO. 2:19-CV-00072-TSZ

**LANE POWELL PC**  
1420 FIFTH AVENUE, SUITE 4200  
P O BOX 91302  
SEATTLE, WASHINGTON 98111  
206.223.7000 FAX: 206.223.7107

SHISHIDO TAREN PLLC

By s/ Jordan A. Taren

Jordan A. Taren, WSBA No. 50066  
Robin J. Shishido, WSBA No. 45926

1001 Fourth Avenue, Suite 3200  
Seattle WA, 98154  
Telephone: (206) 684-9320  
jtaren@shishidotaren.com  
rshishido@shishidotaren.com

*Attorneys for Plaintiff*

MACDONALD HOAGUE & BAYLESS

By s/ Jeffrey L. Taren

Jeffrey L. Taren, WSBA No. 50275  
Katherine Chamberlain, WSBA No. 40014

705 Second Avenue, Suite 1500  
Seattle, WA 98104  
Telephone: (206) 622-1604  
JeffreyT@mhb.com  
KatherineC@mhb.com

*Attorneys for Plaintiff*

1 **ORDER**

2 On March 8, 2018, the Parties in the above-captioned action filed a Joint Stipulation to  
3 Remand Removed Action. Having reviewed that stipulation, and finding good cause, the Court  
4 hereby orders as follows:

5 1. Pursuant to 28 U.S.C. § 1447(c), all further proceedings in this action, captioned  
6 *Sirousian v. KinderCare Learning Centers, LLC*, Western District of Washington, Case No. 2:19-  
7 cv-00072-TSZ, are hereby remanded to the Superior Court for King County in the State of  
8 Washington, without fees or costs to either party;

9 2. The Clerk of the Court shall send copies of this Order to all counsel of record for  
10 all parties;

11 3. Pursuant to 28 U.S.C. § 1447(c), the Clerk of the Court shall mail a certified copy  
12 of this Order to the Clerk of the Court for King County Superior Court;

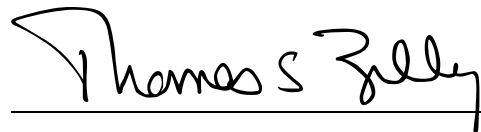
13 4. The Clerk of the Court shall also transmit the record herein to the Clerk of the  
14 Court for King County Superior Court;

15 5. The parties shall file nothing further in this matter, and are instead instructed to  
16 seek any further relief to which they believe they are entitled from the courts of the State of  
17 Washington, as may be appropriate in due course; and

18 6. The Clerk of the Court shall CLOSE this case.

19 IT IS SO ORDERED.

20 DATED this 22nd day of March, 2019.

21 

22  
23 Thomas S. Zilly  
24 United States District Judge  
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